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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF WYOMING

BCB CHEYENNE LLC d/b/a BISON)
BLOCKCHAIN, a Wyoming limited liability)
Company, .)
)
Plaintiff,)
)
V.) Civil No. 23-CV-79
MINICONE WYOMING DATA CENTED)
MINEONE WYOMING DATA CENTER,)
LLC, a Delaware limited liability company;)
MINEONE PARTNERS LLC, a Delaware)
limited liability company; TERRA CRYPTO)
INC., a Delaware corporation; BIT ORIGIN,	
LTD, a Cayman Island Company;)
SONICHASH LLC, a Delaware limited)
liability company; and JOHN DOES 1-20,)
related persons and companies who control)
or direct some or all of the named Defendants,	
)
Defendants.)

PLAINTIFF'S RESPONSE AND OPPOSITION TO BITMAIN TECHNOLOGIES GEORGIA LIMITED'S MOTION TO SET ASIDE THE DEFAULT

COMES NOW Plaintiff BCB Cheyenne LLC d/b/a Bison Blockchain, through its counsel, and hereby submits its Response and Opposition to Defendant Bitmain Technologies Georgia Limited's *Motion to Set Aside Entry of Default* (Docs. 81 and 82). Plaintiff relies on the following materials to support its Response and Opposition:

- 1. Plaintiff's Response Memorandum;
- 2. Affidavit of Patrick J. Murphy;
- 3. Declaration of Sean P. Murphy, and all of the exhibits attached thereto; and,
- 4. The audiovisual file of the 3/7/23 recorded call with and among Jiaming Li, Erick Rengifo, Michael Murphy, and Emory Pattersen, IV.

WHEREFORE, Plaintiff BCB Cheyenne LLC d/b/a/ Bison Blockchain respectfully requests the Court to deny Bitmain Technologies Georgia Limited's Motion Set aside the Clerk's Entry of Default. Good cause does not exist to set aside the default.

DATED this 21st day of December, 2023.

BCB CHEYENNE LLC d/b/a BISON BLOCKCHAIN,

Plaintiff

By: /s/ Patrick J. Murphy

Patrick J. Murphy (WSB No. 5-1779) Scott C. Murray (WSB No. 7-4896) Williams, Porter, Day & Neville, PC 159 N Wolcott St. Suite 400

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of *Plaintiff's Response* and *Opposition to Bitmain Technologies Georgia Limited's Motion to Set Aside the Default* was delivered to the Court via the CM/ECF System and served upon counsel via CM/ECF electronic transmission this 21st day of December, 2023.

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/s/ Patrick J. Murphy
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